

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS INC.,)	
)	
Plaintiff,)	Civil Action No. 3:09-CV-620 (REP)
)	
v.)	
)	
LAWSON SOFTWARE, INC.,)	
)	
)	
Defendant.)	

**PLAINTIFF ePLUS, INC.’S OBJECTIONS TO DEFENDANT
LAWSON SOFTWARE, INC.’S TRIAL EXHIBIT LIST**

Pursuant to Section V(D)(6) of the Court’s Scheduling Order, Plaintiff ePlus, Inc. (“ePlus”), through counsel, hereby submits the following general and specific objections to Defendant Lawson Software, Inc. (“Lawson”)’s Trial Exhibit List:

General Objections

1. Documents excluded pursuant to the Court’s rulings on motions in limine.

Defendant’s Trial Exhibit List includes nearly 100 documents which the Court has already ordered be excluded from trial either explicitly or implicitly.

2. Documents not previously disclosed during discovery or pursuant to Court Order.

ePlus also objects generally to the introduction of any evidence which, though it may be relevant to Lawson’s defenses, was not previously disclosed during discovery, in its responses to ePlus’s interrogatories or disclosed in Defendant’s Court Ordered Second Supplemental Statement of Invalidity Defenses.

3. Relevance. *ePlus* objects generally to Lawson's introduction of any evidence having no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable and to the introduction of evidence wherein the probative value of that evidence is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence.

4. Exhibits not disclosed. *ePlus* reserves its right to present additional objections to exhibits not yet disclosed to *ePlus* by Lawson, including, but not limited to, Lawson Trial Exhibits DX 118, DX 119, DX 151, DX 152, DX 162, DX 368, DX 369 and DX 370.

5. Duplicative Exhibits. *ePlus* objects generally to Lawson's practice of including the same exhibit multiple times on its Trial Exhibit List.

6. Exhibits not properly described. *ePlus* objects generally to all Lawson exhibits not properly described including exhibits described as "excel spreadsheet" or impermissibly grouped exhibits.

Specific Objections

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
1.		U.S. Patent No. 6,023,683 (Kinross Depo. Exh. 1)	ePLUS0207001-0207021																
2.		U.S. Patent No. 6,055,516 (Kinross Depo. Exh. 2)	ePLUS0207022-0207042																
3.		U.S. Patent No. 6,505,172 (Kinross Depo. Exh. 3)	ePLUS0131866-0131884																
4.		Fisher Scientific International, Inc. Form 10-K dated 03/26/92 (Kinross Depo. Exh. 4)		X	X														
5.		Declaration and Power of Attorney filed on 08/10/94 from the '683 File History (Kinross Depo. Exh. 5)	L0132817-0132820																
6.		Robert Kinross Deposition Transcript dated 11/02/05 from ePlus v. SAP (Kinross Depo. Exh. 6)	ePLUS0200140-0200204				X												
7.		U.S. Patent No. 5,712,989 (Kinross Depo. Exh. 7)	L0260803-0260844																
8.		IBM Technical Viewer/2 (Kinross Depo. Exh. 8)	L0132131-0132134																
9.		IBM Technical Viewer/2 General Information Manual (Kinross Depo. Exh. 9)	L0132122-0132130																
10.		SupplyLink (Kinross Depo. Exh. 10)	ePLUS0481583-0481593																
11.		Response to Second Office Action dated 05/26/98 from the '683 File History (Kinross Depo. Exh. 11)	L0132884-0132910	X															
12.		Designated portions of the Deposition Transcript of Robert Kinross dated 12/02/09		X			X					Disco very Desig nation							
13.		Designated portions of the Deposition Transcript of Douglas Momyer dated 12/09/09		X			X					Disco very Desig nation							
14.		Designated portions of the Deposition Transcript of Douglas Momyer dated 12/10/09		X			X					Disco very Desig							

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
												nation							
15.		Designated Portions of the Deposition Transcript of Johanna O'Loughlin dated April 26, 2010		X			X					Disco very Desig nation							
16.		Deposition Transcript of Kenneth Farber dated 12/16/09					X												
17.		Designated portions of the Deposition Transcript of Kenneth Farber dated 12/16/09		X			X					Disco very Desig nation							
18.		Deposition Transcript of Kenneth Farber dated 12/17/09					X												
19.		Designated portions of the Deposition Transcript of Kenneth Farber dated 12/17/09		X			X					Disco very Desig nation							
20.		Deposition Transcript of Kenneth Farber dated 05/18/10					X												
21.		Designated portions of the Deposition Transcript of Kenneth Farber dated 05/18/10		X			X					Disco very Desig nation							
22.		Amended Schedule A – Topics for Depositions (Farber Depo. Exh. 13)																	
23.		WITHDRAWN																	
24.		ePlus 2009 10-K (Farber Depo. Exh. 15)	ePlus0528737-0528826																
25.		ProcureNet Internal Listing dated 04/13/01 (Farber Depo. Exh. 16)	ePLUS0070332-0070338		X											X			
26.		Manage+ Demo Request Form dated 12/12/01 (Farber Depo. Exh. 17)	ePLUS0010605-0010606																
27.		Requirement for an e-Procurement System Administrative Requirements dated 07/2002 (Farber Depo. Exh. 18)	ePLUS0002709-0002715																
28.		e-Procurement Administration Guide Version 8.1 dated 02/2004	ePLUS0241541-0241590																

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		(Farber Depo. Exh. 19)																	
29.		ePlus Briefing dated 09/2008 (Farber Depo. Exh. 20)	ePLUS0909859-0909889																
30.		Procure+ 6.6 Sales Data Sheet dated 10/21/02 (Farber Depo. Exh. 21)	ePLUS0037213-0037224																
31.		Lawson Insight II for IBM AS/400 Auto Installation Guide for Version 7.2.2.2	L0345798-0345979		X	X							X			X			
32.		Lawson Insight Inventory Control Release 7.0.7 Technical Text	L0359390-0359607		X	X							X			X			
33.		Lawson Insight Inventory Control Release 7.0.7 User Text	L0359608-0360482		X	X							X			X			
34.		Lawson Insight Inventory Control Release 7.0.7 Data File Text	L0358883-00359389	X	X	X							X			X			
35.		Lawson Software Release 6.0	L0004381-00004386										X			X			
36.		Requisitions Training Manual Release 6.0 09/01/94	L0009986-0010038										X			X			
37.		Unix Upgrade Release Notes Release 5.x to 6.0 dated February 1995	L0015260-15289										X			X			
38.		Purchase Order Conversion Workbook Release 6.1 dated November 1995	L0014150-0014247		X	X							X			X			
39.		Inventory Control Conversion Manual Release 6.0 dated February 1994	L0012800-0012836										X			X			
40.		Purchase Order Conversion Manual Release 6.0 dated April 1994	L0012492-0012517		X								X			X			
41.		Lawson Purchase Order Release 6.0 Enhancement Design dated October 30, 1992	L0024261-0024357		X	X							X			X			
42.		Lawson Unix Upgrade Manual Release 6.x to 6.0 dated February 1995 ¹	L0015320-0015614		X	X							X			X			X
43.		Lawson Purchase Order Release 6.0 User Text	L0015615-0016422		X	X										X			
44.		05/23/93 Letter to Lawson from Maurice Blauch from Aircraft Service Int's	L0021190		X	X							X			X			
45.		Email dated 02/15/08 from Drew Burford to Paul Jarboe and Jay	ePLUS0864667																

¹ Exhibit is not accurately described.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		Raulerson regarding Lawson Meeting (Farber Depo. Exh. 36)																	
46.		03/12/10 Plaintiffs First Supplemental Answers and Objections to Defendant Lawson Second Set of Interrogatories										Disco very designation							
47.		05/10/10 Plaintiff's Objections and Response to Defendant Lawson's Sixth Set of Interrogatories										Disco very designation							
48.		Technical Viewer/2* ²	ePlus0509238-0509251	X				X											X
49.		ePlus Acquisition of Structured Computer Services and SourceSYS Inc. Valuation Methodologies and Valuations (Farber Depo. Ex. 58)	ePlus0135341-0135344		X	X													
50.		License Agreement between ePlus and ProcureNet (Farber Depo. Exh. 59)	ePlus0949000-09490017		X	X													
51.		ePlus Systems, Inc. (SCS) (Farber Depo. Exh. 61)	ePLUS0135349-0135351	X	X														
52.		Valuation of Assembled Work Force (Farber Depo. Exh. 62)	ePLUS0135347-0135346	X	X														
53.		ProcureNet, Inc. Form S-1 (Farber Depo. Exh. 63)	ePlus0448712-0448851		X														
54.		ePlus 2001 Annual Report and 10-K (Farber Depo. Exh. 64)																	
55.		ePlus 2002 10-K (Farber Depo. Exh. 65)	ePlus0133288-0133373																
56.		Letter from SEC to ProcureNet, Inc. regarding withdrawal of Registration Statement on Form S-1 dated 11/10/000 (Farber Depo. Exh. 66)			X														
57.		SAP License Agreement (Farber Depo. Exh. 70)	ePLUS0940777-0940801																
58.		ePlus 2001 10-K (Farber Ex. 71)	ePLUS0139447-0139555									DX54							

² Exhibit is not properly designated.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
59.		Designated portions of the Deposition Transcript of James Johnson dated 12/09/09		X			X					Disco very Designation							
60.		Fisher Scientific Annual Report for 1992 (O'Loughlin Depo. Exh. 42)	L0343548-0343586	X	X							DX4							
61.		Fisher RIMS Brochure	L0260595-0260606		X	X	X												
62.		Fisher RIMS Trademark Application No. 74/384676 (Certified Copy)			X	X													
63.		P.O. Writer Plus V. 10 Manual ³	L0126155-0127601												X				
64.		UNIVERSE for UNIX Getting Started Release 2.1 dated February 1994	L0013572-0013711		X	X							X			X			
65.		Gateway 2000/MRO Manual dated May 1991	L0127603-0127886															X	
66.		Accounts Payable Procedures Manual Release 6.0 dated December 1994	L0012181-0012467		X	X							X			X			
67.		Purchase Order User Guide Version 9.0.1 dated November 2008	L0044082-0044359																
68.		IBM Technical Viewer/2 brochure	L0132131-0132134																
69.		Asset Purchase Agreement between ProcureNet, Inc. and ePLUS, Inc. dated May 4, 2001	ePLUS0205193-0205403		X														
70.		Order Entry Procedures Manual Release 6.0 dated October 1994	L0012600-0012799										X			X			
71.	101	Empower your People with Requisition Self-Service and Procurement Punchout (Christopherson Depo. Ex. 10)	ePlus0621234-0621280																
72.	111	Purchase Order File Layout: Release 9.0.1. (Christopherson Depo. Ex. 20)	L0043347.1 – L0043347.50																
73.		Lawson Software Purchase Order Procedures Manual Release 6.0 dated 01/94 (Christopherson Depo. Exh. 39) ⁴	L0013146-013295		X								X			X			
74.		Lawson Software Requisitions Procedures Manual Release 6.0 dated	L0009725-0009773		X								X			X			

³ Exhibit is not properly designated.

⁴ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		01/94 (Christopherson Depo. Exh. 40) ⁵																	
75.		Lawson Software Inventory Control Procedures Manual Release 6.0 dated 01/01/94 (Christopherson Depo. Exh. 41) ⁶	L0012837-0013145		X	X										X			
76.	176	Lawson Procurement Punchout Administration Guide Version 9.0 dated November 2006	L0046293-0046332																
77.	126	P11 Requisitions Self-Service: What's New in Version 8.0.3 for April 27-28, 2004 (Dooner Depo. Exh. 4)	LE02761084-002761113																
78.	127	Application Design Document for S3 Item Search Center; Revision 1.1 (Dooner Depo. Exh. 5)	LE00192055-00192062																
79.	30	Lawson M3 e-Procurement 13.1.1.3.0 Deployment Guide	L0061536-0061745																
80.		ePlus, Inc. Statement of Profit and Loss Fiscal Years ended March 31 (Green Expert Report Exh. C) ⁷																	
81.		ePlus, Inc. Statement of Profit and Loss Fiscal Years ended March 31 (Green Expert Report Exh. C-1) ⁸																	
82.		Lawson Fiscal 2007 Fourth Quarter Report	LE00555035-00555106																
83.		ePlus, Inc. Statement of Profit and Loss Fiscal Years ended March 31 (Green Expert Report Exh. C-2) ⁹									X								
84.	161	SUNY Upstate Medical University Hospital: Welcome to the Lawson Web Requisition: A Guide for the Beginning	ePLUS0241397-0241416																

⁵ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁶ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁷ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 1006.

⁸ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 1006.

⁹ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 1006.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		Requester (Lohkamp Depo. Exh. 15)																	
85.	102	Lawson S3 Requisitions Self-Service and Procurement Punchout Field Enablement dated 10/19/07 (Lohkamp Depo. Exh. 21)	L0135034-0135092																
86.		Printout of notes titled "Systems are running on two platforms: HP-UX PA-RISC and IBM I" (Hvass Depo. Exh. 2) ¹⁰			X	X							X			X			
87.		wip60_mod.txt (Hvass Depo. Exh. 6) ¹¹			X	X							X			X			
88.		Support Mod.txt (Hvass Depo. Exh. 7) ¹²			X	X							X			X			
89.		Cyclical_mod.txt (Hvass Depo. Exh. 8) ¹³			X	X							X			X			
90.		Screen shots by Jeff Hvass (Hvass Depo. Exh. 5) ¹⁴			X	X							X			X			
91.		Jeff Hvass demonstration of 5.0 Support ¹⁵			X	X		X	X							X			
92.		Jeff Hvass demonstration of 5.0 Cobdeliv ¹⁶			X	X		X	X							X			
93.		Jeff Hvass demonstration of 6.0 ¹⁷			X	X		X	X							X			
94.		Jeff Hvass demonstration of 6.1 ¹⁸			X	X		X	X							X			

¹⁰ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

¹¹ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

¹² Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

¹³ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

¹⁴ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

¹⁵ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

¹⁶ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

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¹⁸ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

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95.		CD of Demonstration taken during Deposition of Jeff Hvass	ePLUS0949076		X	X		X	X							X			
96.		J CON Manual Vol. 1	L0123414-0124584																
97.		J CON Manual Vol. 3	L0124585-0125034																
98.		J CON Manual RDB Guide	L0125035-0125221																
99.		ePlus, Inc. Statement of Profit and Loss Fiscal Years ended March 31 (Green Expert Report Exh. C-3) ¹⁹									X								
100.		ProcureNet Inc. Statement of Profit and Loss Fiscal Years ended December 31 (Green Expert Report Exh. D) ²⁰		X	X	X					X								
101.		ePlus, Inc. Statement of Profit and Loss Fiscal Years ended May 31 (Green Expert Report Exh. E) ²¹																	X
102.		Pilot and Comprehensive Electronic Sourcing Program System prepared for Fisher Scientific dated 03/16/94 (Gounaris Depo. Exh. 7)	ePLUS0214268-0214289																
103.		Lawson Software Total Accused License Revenue Fiscal Years ended May 31 (Green Expert Report Exh. J) ²²																	
104.		Technical Viewer/2	G0000362-0000375	X	X										X				
105.		IBM Technical Viewer/2 General Information Manual (Gounaris Depo. Exh. 10)	G000002-000011																
106.		IBM Technical Viewer/2 General Information	ePlus0209840-0209856;									X							
107.		IBM Technical Viewer/2 (Gounaris Depo. Exh. 11)	G000030-000033																
108.		Fisher Electronic Sourcing Proposal dated 05/30/95	ePlus0218032-0218056		X	X													

¹⁹ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 1006.

²⁰ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 1006.

²¹ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 1006.

²² Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 1006.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		(Eng Depo. Exh. 6)																	
109.		Lawson Software, Inc. Total Accused Maintenance Revenue Fiscal Years Ended May 31 (Green Expert Report Exh. J-2) ²³																	
110.		IBM Technical Viewer/2 (Pages from Eng Depo. Exh. 3)	ePlus0218101-0218104 (ENG000007-10)	X								X							
111.		5799-IBM Technical Viewer/2 (Pages from Eng Depo. Exh. 3)	ePlus0210933-0210938	X			X												
112.		Video – Interactive Electric Technical Manuals	L0290560			X													
113.		Technical Viewer/2 (Pages from Eng Depo. Exh. 3)	ePlus0459751-0459764	X	X						X				X				
114.		IBM Technical Viewer/2 General Information Manual (Pages from Eng Depo. Exh. 3)	ePlus0209857-0209867										X						
115.		Procure+ History (O'Connell Depo. Ex. 3)	ePlus 0042779-042780				X												
116.		Designated portions of Deposition Transcript of Laurene Fielder McEneny dated 06/10/10		X			X					Disco very Desig nation							
117.		Guided Tour - Version 10.1 (McEneny Depo. Exh. 2)	L0126514-0126701																
118.		Reserved for updated Lawson License and Maintenance Revenue Spreadsheet ²⁴		OBJECTIONS RESERVED															
119.		Reserved for updated Lawson Services Revenue Spreadsheet ²⁵		OBJECTIONS RESERVED															
120.		Tenth Edition Software Revision 10.0 dated 04/93 (McEneny Depo. Exh. 5)	L0126501-0126513																
121.		Purchased Tutorial- Table of Contents re: P.O. Writer	L0126718-0126964																

²³ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 1006.

²⁴ Lawson may update its license and maintenance spreadsheet depending on the Court's ruling on Lawson's pending motion in limine.

²⁵ Lawson may update its license and maintenance spreadsheet depending on the Court's ruling on Lawson's pending motion in limine.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		(McEneny Depo. Exh. 6)																	
122.		P.O. Writer Tenth Edition Software 10.0 (McEneny Depo. Exh. 103) ²⁶	L0126501-0126513																
123.		The American Tech Client Support Program (McEneny Depo. Exh. 95)	ePlus0219927-0219937																
124.		We've Got Connections! re: P.O. Writer Plus Version 6.0 (McEneny Depo. Exh. 96)	ePlus0219612-0219617																
125.		Note Report re: Kirkland & Ellis dated 02/01/06 (McEneny Depo. Exh. 97)	ePlus0219493-0219494																
126.		Inventory Control Version 10.0: Office Copy (McEneny Depo. Exh. 98)	L0126147-0126395																
127.		Ad Hoc Reporting Version 10.0 (McEneny Depo. Exh. 99)	L0126396-0126402		X														
128.		Bar Code Interface Version 10.0 ((McEneny Depo. Exh. 100)	L0126403-0126422		X														
129.		Data Interface Utility Version 10.0 (McEneny Depo. Exh. 101)	L0126423-0126481																
130.		EDI Interface User's Guide (McEneny Depo. Exh. 102)	L0126482-0126500																
131.		P.O. Writer Plus Fax Module Version 10.0 (McEneny Depo. Exh. 105)	L0126702-0126717		X														
132.		P.O. Writer Receiving Manual for Version 10.0 (McEneny Depo. Exh. 106)	L0127297-0127504		X														
133.		P.O. Writer requisition interface menu (McEneny Depo. Exh. 107)	L0126965-0126980																
134.		Security Administrator's Guide Version 10.0 (McEneny Depo. Exh. 108)	L0126981-0126999		X														
135.		Stock Requisitioning & Kitting System Administrator's Guide (McEneny Depo. Exh. 109)	L0127000-0127019		X														
136.		Stock Requisitioning & Kitting Version	L0127020-0127102		X														

²⁶ Exhibit is not properly described.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		10.0 (McEneny Depo. Exh. 110)																	
137.		Supplier Rating Report dated 02/03/93 (McEneny Depo. Exh. 111)	L0127103-0127137		X														
138.		System Administrator's Guide Version 10.0 (McEneny Depo. Exh. 112)	L0127138-0127227		X														
139.		Version Upgrade Kit Version 10.0 (McEneny Depo. Exh. 113)	L0127228-0127255		X														
140.		Purchase Requisitioning System Administrator's Guide Version 10.0 (McEneny Depo. Exh. 114)	L0127256-0127296																
141.		Requisitioning Module Version 10.0 Office Copy (McEneny Depo. Exh. 115)	L0127505-0127601																
142.		Buyers' Guide to Software for Purchasing dated 11/23/89 (McEneny Depo. Exh. 118)	ePLUS0219905-0219910		X	X													
143.		Requisitions User Guide Version 9.0.1 dated November 2008 (Christopherson Depo. Exh. 6)	L0061098-0061299																
144.		WITHDRAWN																	
145.		Diagram of the Gateway P.O with Fisher CSR (Pages of Ramos Depo. Exh. 5)	JR000206		X	X		X											
146.		Gateway 200/MRO Version dated 05/91 (Ramos Depo. Exh. 6) ²⁷	ePLUS00209905-0210188																X
147.		Vendor Function and Cost Comparison dated 03/17/94 (Ramos Depo. Exh. 7)	ePLUS0501578-0501579				X	X											
148.		Competitive Product Evaluation dated 08/92 (Ramos Depo. Exh. 8)	ePLUS0219353-0219379		X	X	X	X							X				
149.		Software License Agreement between Aramco Services Company and Technical Services Associates, Inc. dated 04/28/92 (Ramos Depo. Exh. 9)	ePLUS0469381-0469407																
150.		Gateway Screenshots	L0128494-128564			X	X	X						X			X		

²⁷ Exhibit is not properly described.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
151.		Reserved for summary of updated Lawson License Revenue Spreadsheet		OBJECTIONS RESERVED															
152.		Reserved for summary of updated Lawson Maintenance Revenue Spreadsheet		OBJECTIONS RESERVED															
153.		Gateway DOS Product Overview	L0128368-0128395										X			X			
154.		Gateway Newsletter dated 01/91	L0128358-0128361		X	X													
155.		Gateway Purchasing Manual dated 12/93	L0127887-0128208		X														
156.		Gateway Newsletter dated 04/92	L0128363-0128366																
157.		Gateway Inventory Process User Manual	L0128209-0128356		X														
158.	494	Fisher/Gateway Interface dated 06/04/90 (Jacobs Depo. Ex. 4)	ePLUS0219328-0219336																
159.	495	Letter from Tom Side to David Wilson dated 07/16/90 (Jacobs Depo. Ex. 5)	ePLUS0219337		X	X													
160.	496	TSA, Inc. letter to Fisher regarding file structures dated 10/29/90 (Jacobs Depo. Ex. 6)	ePLUS0216634-0216641		X	X													
161.	497	TSA, Inc. Proposal to Provide Re-engineering of Procurement System prepared for New York University Medical Center dated 05/12/94 (Jacobs Depo. Ex. 7)	ePLUS0497214-0497222		X	X													
162.	498	Letter from Kathy Detar-Gennuso (Fisher Scientific) to Dave Wilson regarding purchase order file transmission dated 11/30/89 (Jacobs Depo. Ex. 8)	ePLUS0501468-0501474		X	X	X												
163.		Letter from Ann Mull (Fisher Scientific) to NYU Medical Center regarding purchase order without transmission structure (Jacobs Depo. Ex. 9)	ePLUS0218057-0218061				X	X											
164.		Gateway Purchasing Manual dated 12/1993 (Jacobs Depo. Ex. 10)	ePLUS0212821-0213070		X							X							
165.		Gateway System Management Manual dated 12/1993 (Jacobs Depo. Ex. 11)	ePLUS0213143-0213404		X														
166.		Gateway Inventory Processes User	ePLUS0213405-0213552		X														

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		Manual dated 12/1993 (Jacobs Depo. Ex. 12)																	
167.		Reserved for updated Lawson Services Revenue Spreadsheet		OBJECTIONS RESERVED															
168.		CUE Files	L0345001																
169.		Lawson M3 Application Suites (7.1 Apps) (v2.3.1) (Hager Depo. Exh. 14)	L0157227.1-0157227.129																
170.		REALITY Purchase Order Module	EP019996-020239		X								X			X			
171.		UNIVERSE Release Notes 2.1 dated July 1994	L0014416-0014532		X		X						X			X			
172.		UNVERSE for UNIX Developer's Workbench Release 2.1 dated January 1994	L0017726-0017890		X		X						X			X			
173.		UNIVERSE CASE and 4GL Release 2.1 dated April 1994	L0017891-0018119		X								X			X			
174.		Designated portions of the Deposition of Lynn Cimino (South Jersey Health Systems, Inc.) dated 03/02/10		X			X					Discovery Designation				X			
175.		UNIVERSE for UNIX Database administration Release 2.1 dated March 1994	L0025716-0025938		X								X			X			
176.		Inventory Control User Guide Version 9.0 dated May 2007	L0031954-0032248																
177.		Procurement Management Technical Guide Version 8.0.3 dated October 2003	L0042441-0042670																
178.		Requisitions User Guide Version 9.0 dated November 2006	L0044870-0045068																
179.		Lawson M3 e-Procurement 13.1.1.3.0 Installation and Setup Guide	L0061746-0061819																
180.		Lawson Supply Chain Management Conversion Guide Version 9.0.1 dated April 2009	L0327408-0327569																
181.		Lesson Four Process Bids	LE02060596-02060609	X	X														
182.		CD of videotaped recording of data made during deposition on 03/02/10 (Cimino Depo Exh. 11)																	
183.		Designated portions of the Deposition of Manuel D. Matias dated 03/10/10		X			X					Discovery							

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												Designation							
184.		CD of Demonstration made during deposition of Manuel D. Matias (Robert Wood Johnson) dated 03/10/10																	
185.		Designated portions of the Deposition of Robert Irwin dated 03/10/10		X			X					Discovery Designation							
186.		Purchase Order Procedures Manual Version 7.2.0 dated February 1999	LE01078665-01078888		X	X							X			X			
187.		Lawson Software Americas, Inc. Statement of Work for Robert Wood Johnson University Hospital (Irwin Depo. Exh. 6)	RWJ000086-000124																
188.		Lawson Self Service RSS Training Guide Lawson Software regarding Robert Wood Johnson University Hospital dated 07/27/09 (Irwin Depo. Exh. 7)	RWJ003998-004020																
189.		Lawson Implementation Buyer Training Guide regarding Robert Wood Johnson University (Irwin Depo. Exh. 8)	RWJ003860-003912																
190.		Chapter 20 Application Changes from Release 6.0 (Shamos Depo. Exh. 3) ²⁸	L0373955-0374057	X	X	X							X			X			
191.		Requisitions Procedures Manual Version 7.2.1 dated April 1999	LE01101046-01101231		X	X							X			X			
192.		Purchase Order Procedures Manual Version 7.2.1 dated April 1999	LE01100551-01100774		X	X							X			X			
193.		Procurement Management Technical Guide Version 7.2.1 dated April 1999	LE00354500-00354727		X	X							X			X			
194.		Designated portions of the Deposition of Kristy Oliver (Blount) dated 03/11/10		X			X					Discovery Designation							
195.		Requisitions Procedures Manual Version	LE01078889-01079072		X	X							X			X			

²⁸ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		7.2.0 dated February 1999																	
196.		Response to Request for Proposal Blount Memorial Hospital dated 01/25/07 (Blount Depo. Exh. 3)	L0083359-0083446																
197.		Lawson Software Statement of Work for Blount Memorial Hospital (Blount Depo Exh. 4)	B003802-003837																
198.		E-mail communication from Katrina Rice to Kristy Oliver regarding Item Master Upload Template with attachment dated 12/04/08 (Blount Depo. Exh. 11)	B00817-00827																
199.		Email from Katrina Rice to Kristy Oliver enclosing presentation "RSS Requisitions" dated 09/09/08 (Blount Depo. Ex. 13)	B003039-003071																
200.		CD containing videotaped demonstration by Kristy Oliver during deposition dated 03/11/10																	
201.		Designated portions of the deposition of William Ray Yuhasz and Vicky Miller Williams (Novant Health) dated 02/19/10		X			X					Disco very Designation							
202.		Requisition Self Service: RSS 9 Training Manual dated 11/09 (Novant Depo. Exh. 6)	NOV0838-0869																
203.		Customer Service Information presentation (Novant Depo. Exh. 7)	NOV0870-0904																
204.		Lawson/SciQuest Procure-to-Pay (P2P) Solution Overview for Novant Health (Novant Depo. Exh. 8)	LE00509459-00509464																
205.		Email communications between Mary Segreti (Lawson) and Pat Burton (Novant) with Request For Proposal dated 03/20/09 (Novant Depo. Exh. 9)	NOV0394-0443																
206.		Email from Pat Burton (Novant) to Distribution regarding Novant responses to RFP questions dated 03/17/09 (Novant Depo. Exh. 10)	ePLUS0911571-0911582																

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
207.		Novant Health P2P Project dated 01/16/09 (Novant Depo. Exh. 11)	LE00504119-0504121																
208.		ProcessFlow 9.0.0.x Source Code	L0344999																
209.		Novant Screenshots captured during 02/19/10 Novant 30b6 deposition (Novant Depo. Exh. 15)																	
210.		File History for U.S. Trademark Reg. No. 1,838,080: Fisher RIMS dated 05/31/94 (certified copy) ²⁹ (O'Loughlin Depo. Exh. 40)	L0260585-0260624		X	X						X							X
211.		Fisher Scientific International 1994 Annual Report; dated 1994 (O'Loughlin Depo. Exh. 41)	L0343632-0343667		X	X													
212.		Fisher Scientific International Form 10-K for 1992 (O'Loughlin Depo. Exh. 42)	L0343548-0343586	X	X	X													
213.		Fisher Scientific International Form 10-K for 1993 (O'Loughlin Depo. Exh. 43)	L0343587-0343631		X	X													
214.		Lawson 2010 10-K																	
215.		7.2.2.4 to 8.0.3. Application and Environment Upgrade iSeries Information Document and Budgetary Estimate dated 03/2005 (Raleigh Depo. Exh. 15)	LE02782644-02782669																
216.		Lawson Requisitions Self-Service User Guide Version 9.0.1 dated May 2009	L0045474-0045553																
217.		Purchase Order User Guide Version 9.0.1 dated November 2008	L0052019-0052296																
218.		Inventory Control User Guide Version 9.0.1 dated November 2008	L0032249-0032549																
219.		Patent License and Settlement Agreement between SAP America, Inc., SAP A.G. and ePlus Inc. dated 12/11/06 (Wissing Depo. Exh. 45) ³⁰	ePLUS0940777-0940801																

²⁹ Exhibit is not properly described.

³⁰ Lawson reserves the right to remove all or portions of this exhibit based on the Court's findings on the pending motions in limine.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
220.		Website printout from <i>www.SAP.com/usa</i> regarding SAP Business Suite: Integrated Business Applications dated 05/08/10 (Wissing Depo. Exh. 46) ³¹	L0378501		X	X													
221.		Website printout from <i>www.SAP.com/usa</i> regarding Software Maintenance and Support dated 05/08/10 (Wissing Depo. Exh. 47) ³²	L0378534		X	X													
222.		Website printout from <i>www.SAP.com/usa</i> regarding SAP Supplier Relationship Management dated 05/08/10 (Wissing Depo. Exh. 48) ³³	L0378502-0378509		X	X													
223.		Website printout from <i>www.SAP.com/usa</i> regarding ERP Software From SAP dated 05/08/10 (Wissing Depo. Exh. 49) ³⁴	L0378527-0378533		X	X													
224.		Website printout from <i>www.SAP.com/usa</i> regarding Customer Relationship Management (CRM) Software from SAP dated 05/08/10 (Wissing Depo. Exh. 50) ³⁵	L0378510-0378526		X	X													
225.		SAP Catalog Content Management (Wissing Depo. Exh. 51) ³⁶	L0378483-0378496		X	X													
226.		IDC Market Analysis (Wissing Depo. Exh. 52)	SAPAMERICA00001-00029																
227.		Market Analysis – IDC Worldwide ERP	LE0561289-0561333																
228.		AMR Research – The ERP Market Sizing Report, 2006-2011	SAPAMERICA00030-00065																

³¹ Lawson reserves the right to remove all or portions of this exhibit based on the Court's findings on the pending motions in limine.

³² Lawson reserves the right to remove all or portions of this exhibit based on the Court's findings on the pending motions in limine.

³³ Lawson reserves the right to remove all or portions of this exhibit based on the Court's findings on the pending motions in limine.

³⁴ Lawson reserves the right to remove all or portions of this exhibit based on the Court's findings on the pending motions in limine.

³⁵ Lawson reserves the right to remove all or portions of this exhibit based on the Court's findings on the pending motions in limine.

³⁶ Lawson reserves the right to remove all or portions of this exhibit based on the Court's findings on the pending motions in limine.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		(Wissing Depo. Exh. 53)																	
229.		AMR Research – The Supply Chain Management Market Sizing Report, 2006-2011	LE00216064-216099																
230.		IBM Technical Viewer/2 General Information Manual	G0000012-29									X							
231.		SAP Business all in one Fast Start Program (Wissing Depo. Exh. 55) ³⁷	L0378497-0378500		X	X													
232.		File History of U.S. Patent No. 6,055,516 (Certified Copy)	L0132511-0132698																
233.		File History of U.S. Patent No. 6,023,683 (Certified Copy)	L0132699-0132936																
234.		Notice of Allowability regarding Application No. 08/288,577 (U.S. Patent No. 6,023,683) dated 11/20/98	L0132912-0132916	X															
235.		File History of U.S. Patent No. 6,505,172 (Certified Copy)	L0131875-0132510									X							
236.		Notice of Allowability regarding Application No. 09/532,557 (U.S. Patent No. 6,505,172) dated 03/27/01	L0132089-0132094	X								X							
237.		File History of Reexamination No. 90/008,104 ³⁸ (Certified Copy)			X	X										X			
238.		Decision on Request for Reexamination 90/008,104 dated 10/28/06 ³⁹ (Certified Copy)			X	X										X			
239.		File History of Reexamination No. 90/009,636 (U.S. Patent No. 6,055,516) ⁴⁰ (Certified Copy)			X	X										X			
240.		Order Granting/Denying Request for Ex			X	X										X			

³⁷ Lawson reserves the right to remove all or portions of this exhibit based on the Court's findings on the pending motions in limine.

³⁸ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

³⁹ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

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Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		Parte Reexamination for Reexamination No. 90/009,636 dated 01/15/10 ⁴¹																	
241.		File History of Reexamination No. 95/000,487 (U.S. Patent No. 6,505,172) (Certified Copy) ⁴²			X	X										X			
242.		Order Granting/Denying Request for Inter Partes Reexamination for Reexamination No. 95/000,487 dated 10/23/09 ⁴³			X	X										X			
243.		File History of Reexamination No. 90/011,066 ⁴⁴ (Certified Copy)			X	X										X			
244.		U.S. Patent No. 4,992,940: Dworkin (Certified Copy)	L0260625-0260640																
245.		U.S. Patent No. 5,319,542: King (Certified Copy)	ePLUS0130297-0130307																
246.		U.S. Patent No. 4,984,155: Geier (Certified Copy)	ePlus0137907-0137924		X								X			X			
247.		5.0 Source Code ⁴⁵	L0172985		X	X		X	X							X			
248.		6.1 Source Code ⁴⁶	L0345246		X	X		X	X				X			X			
249.		6.1 Source Code from Ciber ⁴⁷	L0417613		X	X		X	X							X			
250.		7.2.4 Source Code	L0135743		X								X			X			
251.		9.0.1 MSP2 Source Code	L0135741																
252.		8.0.3 Source Code	L0135744																
253.		9.0.1 Source Code	L0290559																
254.		9.0.0 Source Code	L0135742																
255.		8.1.0 Source Code	L0135745		X														

⁴¹ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁴² Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁴³ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁴⁴ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁴⁵ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁴⁶ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁴⁷ Lawson offers this exhibit pursuant to the Court's rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
256.		PHYSICAL: Bendix-Philips 1966 Thru 1969 Auto Radio Replacement Parts Price List ⁴⁸			X		OTHER OBJECTIONS RESERVED PENDING INSPECTION												
257.		PHYSICAL: Sears 1984 Fall/Winter Catalog			X		OTHER OBJECTIONS RESERVED PENDING INSPECTION												
258.		PHYSICAL: Montgomery Wards Fall/Winter 1984 Catalog			X		OTHER OBJECTIONS RESERVED PENDING INSPECTION												
259.		PHYSICAL: Address book			X		OTHER OBJECTIONS RESERVED PENDING INSPECTION												
260.		PHYSICAL: Rolodex			X		OTHER OBJECTIONS RESERVED PENDING INSPECTION												
261.		PHYSICAL: Verizon Yellow pages January 2008 for Area Code 804			X		OTHER OBJECTIONS RESERVED PENDING INSPECTION												
262.		Designated portions of Steve Mencarini Deposition dated May 26, 2010		X			X					Disco very Desig nation							
263.		ePlus 2000 10-K	ePlus0132902-77																
264.		ePlus 2001 10-K and Annual Report	ePLUS0132821-0132893																
265.		ePlus 2002 10-K	ePlus0133290-71																
266.		ePlus 2003 10-K and Annual Report (Mencarini Depo. Ex. 73)	ePlus0132738-0132820																
267.		ePlus 2004 10-K (Mencarini Depo. Exh. 74)	ePlus0136030-0136100																
268.		ePlus 2005 10-K (Mencarini Ex. 75)	ePlus0506321-0506409																
269.		ePlus 2006 10-K	ePlus0528836-0528969																
270.		ePlus 2007 10-K (Mencarini Depo. Exh. 93)																	
271.		ePlus Amended 2007 10-K	L0415808-0415815																
272.		ePlus 2008 10-K	ePlus0432996-073									X							
273.		ePlus 2008 10-K and Annual Report (Mencarini Depo. Exh. 92)										X							
274.		ePlus 2009 10-K	ePlus0528741-824									X							
275.		ePlus 2009 10-K and Annual Report (Mencarini Depo. Exh. 76)	ePLUS0528737-0528826									X							
276.		Lawson Software Acquisition History	L0344871-0344872		X		X		X										
277.		01/28/04 Letter to Lawson enclosing Value Added Reseller Agreement	L0344941-0344952		X		X									X			

⁴⁸ Physical Exhibits are available for Inspection.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		between Micro Focus and Lawson																	
278.		ePlus Content Services income statement for 2001-2002 (Mencarini Depo Exh. 77)	ePlus091337-091342																
279.		ePlus Content Services income statement for 2002-2003 (Mencarini Depo. Exh. 78)	ePlus091331-091336																
280.		ePlus Content Services income statement for 2003-2004 (Mencarini Depo. Exh. 79)	ePlus091343-091348																
281.		ePlus Systems income statement for 2001-02 (Mencarini Depo. Exh. 80)	ePlus091363-091368																
282.		ePlus Systems income statement for 2002-03 (Mencarini Depo. Exh. 81)	ePlus091369-091374																
283.		ePlus Systems income statement for 2003-04 (Mencarini Depo. Exh. 82)	ePlus091375-091380																
284.		Balance sheet for ePlus Content Services for 2002 (Mencarini Depo. Exh. 84)	ePlus091349-091351																
285.		Balance sheet for ePlus Content Services for 2003 (Mencarini Depo. Exh. 85)	ePLUS091352-091354																
286.		Balance sheet for ePlus Content Services for 2004 (Mencarini Depo. Exh. 86)	ePlus091355-091358																
287.		Balance sheet for ePlus Content Services for 2004 (Mencarini Depo. Exh. 87)	ePlus091359-091362																
288.		Balance sheet for ePlus Systems for 2002 (Mencarini Depo. Exh. 88)	ePlus091390-94																
289.		Balance sheet for ePlus Systems for 2003 (Mencarini Depo. Exh. 89)	ePlus091395-99																
290.		Balance sheet for ePlus Systems for 2004 (Mencarini Depo. Exh. 90)	ePlus091400-04																
291.		ePlus Acquisition of Structured Computer Services and SourceSys Inc. Valuation Methodologies and Valuations	ePlus0139230-51		X	X	X												

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
292.		Excel Spreadsheet for ePlus Systems and Content Services (Magnum Depo. Exh. 134)	ePlus0949075																
293.		Report and Recommendation to Board of Directors for Acquisition of ProcureNet	ePlus0131613-33		X	X													
294.		Asset Purchase Agreement between ProcureNet and ePlus dated May 4, 2001	ePlus0205193-0205403		X							X							
295.		April 14, 1999 ProcureNet / Fisher Agreement	ePlus0700136-155		X	X		X				X							
296.		ProcureNet Internal Listing 4/15/01	ePlus0134665-0134957		X		X						X		X	X			
297.		Summary of potential license, service, and maintenance revenues (in U.S. dollars) from January 1, 2003 to June 31, 2004 by customer name and SKU (Appendix E)																	
298.		Lawson 2002 10-K	L0066293-0066373																
299.		Lawson 2003 10-K	L0074557-0074677																
300.		Lawson 2004 10-K	L0066466-0066596																
301.		Lawson 2005 10-K	L0074812-0074948																
302.		Lawson 2006 10-K	L0087085-0087278																
303.		Lawson 2007 10-K	L0066977-0067092																
304.		Lawson 2008 10-K	L0067103-0067231																
305.		Lawson 2009 10-K (Lohkamp Exh. 24)	L0067240-0067336																
306.		Lawson 2001 S-1	L0151774-0152367																
307.		IBM OEM Software Agreement	L0344898-0344903		X														
308.		Value Added Industry Remarketer Agreement Exhibit 10.24 dated 08/13/01 (Green Depo. Exh. 4)	L0145818-0145865		X											X			
309.		Lawson Associates Inc. Application Partner Agreement with Arbor Software Corporation dated 08/13/01 (Green Depo. Exh. 5)	L0145866-0145917		X											X			
310.		IBM WebSphere License (Lawson Exh. 126)	L0344875-0344897		X											X			
311.		Micro Focus License (Lawson Exh. 127)	L0344977-0344998		X											X			
312.		Excel spreadsheet (12/26/09 White Ex. 3)	L0135750																

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
313.		Excel spreadsheet (4/21/10 White Ex. 14)	L0340558																
314.		Excel spreadsheet, FY05-March of FY10 Maintenance and License Revenue Spreadsheet	L0415816																
315.		Excel spreadsheet ⁴⁹	L0415818																
316.		Excel spreadsheet	L0345021																
317.		Excel spreadsheet (White Depo. Exh. 8)	L0234993																
318.		Excel spreadsheet	L0345002																
319.		Excel spreadsheet (White Depo. Exh. 13)	L0234992																
320.		Lawson SKU list (Lawson Ex. 123)	L0204134																
321.		Lawson Turnover Document – Release 9	LE01336793-851																
322.		Lawson Business Management Solutions – Release 9.0.0.1	LE00840919-66																
323.		Lawson Software Inc. Client Legal Audit Documents	LE02698476-478		X														
324.		Lawson Insight AS/400 BOM – Release 7.1.5	LE01364204-207		X	X	X						X						
325.		Lawson Software Market Position	LE00142486-512		X		X												
326.		Lawson Software FY09 Business Plan and Budget	LE00311100-168																
327.		6.1 Product Launch Feature / Benefit Document	L0026861-881		X	X							X			X			
328.		Lawson Software Non-Exclusive License Agreement	L0168997-9036																
329.		Excel Spreadsheet	L0157226																
330.		Invalidity Analysis of Johnson et al, U.S. Patents 6,023,683, 6,055,516 and 6,505,172 by Expert Michael I. Shamos, PH.D, J.D. (Shamos Depo. Exh. 10)					X												
331.		Baxter Healthcare Corporation: ASAP Express	L0340559-0340571		X	X										X			

⁴⁹ Exhibit is not properly described.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
332.		Lawson Software Inventory Control Conversion Manual release 6.0 ⁵⁰	L0012800-0012836		X	X							X			X			
333.		Summary of 5.0 and 6.0 Differences – IC, PO and RQ ⁵¹	L0017230-0017236		X	X							X			X			
334.		“Beyond Business Process Redesigning Redefining Baxter’s Business Network, MIT Sloan Management Review; Short et al., dated Fall 1992 ⁵²	L0343527-0343543		X	X										X			
335.		Lawson Laptop Demonstration System S3 Version 9.0	L0067337																
336.		Lawson M3 Demonstration System	L0135748																
337.		ePLUS Demonstration System (https://procureplus.eplusononline.com/demo/pplus/)			X											X			
338.		ePlus Data (.csv file)	ePLUS0949077																
339.		Initial Infringement Expert Report of Alfred C. Weaver, PhD. (SAP litigation)	ePlus0445053-0445362				X												
340.		Report of Credit Suisse First Boston on Lawson Software dated 11/24/03											X						
341.		J.P. Morgan Securities Equity Research regarding Lawson Software dated 09/26/03											X						
342.		Report by McDonald Equity Research regarding Ariba, Inc. dated 05/21/02 ⁵³			X								X						
343.		Report by Morgan Stanley regarding Ariba dated 05/01/02 ⁵⁴			X								X						
344.		Report by Robinson-Humphrey regarding Clarus Corp. dated 07/26/01			X								X						
345.		Report by Robert Stephens regarding Commerce One, Inc. dated 01/24/02 ⁵⁵			X								X						

⁵⁰ Lawson offers this exhibit pursuant to the Court’s rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁵¹ Lawson offers this exhibit pursuant to the Court’s rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁵² Lawson offers this exhibit pursuant to the Court’s rulings on the motions in limine and pursuant to Federal Rule of Evidence 103.

⁵³ Lawson reserves the right to remove all or portions of this exhibit based on the Court’s findings on the pending motions in limine.

⁵⁴ Lawson reserves the right to remove all or portions of this exhibit based on the Court’s findings on the pending motions in limine.

⁵⁵ Lawson reserves the right to remove all or portions of this exhibit based on the Court’s findings on the pending motions in limine.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
346.		Report by Salmon Smith Barney regarding Ariba, Inc. dated 05/01/02 ⁵⁶			X								X						
347.		Designated portions of the Deposition Transcript of Gerald Wissing (SAP) dated May 11, 2010 ⁵⁷		X			X					Discovery Designation							
348.		Application Design Documents for S3 Item Search Center (Weaver Depo. Exh. 10)	LE00192055-00192062																
349.		ePlus Return on Investment for Technology Acquired for ProcureNet (Green Expert Report Exh. F)																	
350.		Lawson Software Expectations for Procurement Software for Fiscal Years Ended May 31 (Green Expert Report Exh. G)														X			
351.		Lawson Software License Revenue vs. Consulting Revenue Quarterly Data: 1Q2006-3Q2010 (Green Expert Report Exh. H)																	
352.		Lawson Software Customers that Purchased Procurement Software License Fiscal Years 2005-2009 (Green Expert Report Exh. I)																	
353.		Lawson Software Profits on Accused Revenue Fiscal Years Ended May 31 (Green Expert Report Exh. J-1)																	
354.		Lawson Software Count of Allegedly Infringing Licenses Sold Fiscal Years Ended May 31 (Green Expert Report Exh. J-3)																	
355.		Lawson Software Lump Sum as a Percent of Procurement Software Revenue & Operating Profits Fiscal Years Ended May 31 (Green Expert Report Exh. K)														X			
356.		Lawson Software Procurement Software:																	

⁵⁶ Lawson reserves the right to remove all or portions of this exhibit based on the Court's findings on the pending motions in limine.

⁵⁷ Lawson reserves the right to remove all or portions of this exhibit based on the Court's findings on the pending motions in limine.

Def. No.	Plt. No.	Description of Exhibit	Bates Number	106	401/402	403	801/802/805	901	1002	1003	1006	DUP	FRCP 26	IL	MD	MIL	NT/T	NR	INACC
		License Earnings Fiscal Years Ended May 31 (Green Expert Report Exh. K-1)																	
357.		Lawson Software Procurement Software: Maintenance Earning Fiscal Years Ended May 31 (Green Expert Report Exh. K-2)																	
358.		Lawson Software Customer Numbers: Purchases of IC, PO & RQ Applications (Green Expert Report Exh. L)																	
359.		Lawson Software Customer Numbers Purchases of FINPRO (Green Expert Report Exh. L-1)																	
360.		Lawson Software Customer Numbers: Purchases of M3EPR (Green Expert Report Exh. L-2)																	
361.		Lawson Software Customer Numbers: Purchases of PROC (Green Expert Report Exh. L-3)																	
362.		Lawson EDI for Supply Chain Management Installation Guide Version 9.0.1.x dated November 2008	LE03273818-03273832																
363.		Lawson Software Total Accused License Revenue November 1, 2003-March 31, 2010																	
364.		Lawson Software Total Accused License Revenue May 19, 2009 – August 6, 2010																	
365.		S3 and SHCM Price Configuration Setup (Lohkamp Depo. Exh. 26)	L0234993.1-.38																
366.		M3 Price Configuration Setup (Lohkamp Depo. Exh. 27)	L0234992.1-31																
367.		M3 Source Code	L0135747																
368.		1006 Summaries																	
369.		Reserved for Exhibits related to new Reserved for invalidity expert																	
370.		Reserved for Exhibits related to new source code expert																	

OBJECTIONS RESERVED

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Respectfully submitted,

/s/

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Attorneys for Plaintiff, ePlus Inc.

Dated: August 11, 2010

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of August, 2010, I will electronically file the foregoing

**EPLUS, INC.'S OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S
TRIAL EXHIBIT LIST**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

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